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April 12, 2006

The Honorable Charles Terreni
Chief Clerk of the Commission
Public Service Commission of South Carolina
Post Office Drawer 11649
Columbia, South Carolina 29211

Re: Application of Palmetto Utility Protection Service, Incorporated for Assignment
of the 811 Abbreviated Dialing Code to be Implemented in South Carolina
Generic Proceeding to Investigate Emergency Services Continuity Plans
Docket No. 2005-390-C

Dear Mr. Terreni:

Enclosed for filing are the original and one copy of BellSouth Telecommunications, Inc.'s ("BellSouth's") Direct Testimony of Kathy K. Blake in the above-referenced matter. This document is an exact duplicate of the e-filed copy submitted to the Commission in accordance with its electronic filing instructions.

By copy of this letter, I am serving all parties of record with a copy of this testimony as indicated on the attached Certificate of Service.

Sincerely,



Patrick W. Turner

PWT/nml
Enclosure
cc: All Parties of Record
DM5 #629262

1 Bellsouth Telecommunications, Inc.
2 Direct Testimony of Kathy K. Blake
3 Before the Public Service Commission of South Carolina
4 Docket No. 2005-390-C
5 April 12, 2006
6

7 Q. Please state your name, your position with Bellsouth
8 Telecommunications, Inc. ("Bellsouth"), and your
9 business address.

10
11 A. My name is Kathy K. Blake. I am employed by BellSouth as Director – Policy
12 Implementation for the nine-state BellSouth region. My business address is
13 675 West Peachtree Street, Atlanta, Georgia 30375.

14
15 Q. Please provide a brief description of your background
16 and experience.

17
18 A. I graduated from Florida State University in 1981, with a Bachelor of Science
19 degree in Business Management. After graduation, I began employment with
20 Southern Bell as a Supervisor in the Customer Services Organization in
21 Miami, Florida. In 1982, I moved to Atlanta where I held various positions
22 involving Staff Support, Product Management, Negotiations, and Market
23 Management within the BellSouth Customer Services and Interconnection
24 Services Organizations. In 1997, I moved into the State Regulatory
25 Organization with various responsibilities for testimony preparation, witness

1 support and issues management. I assumed my current responsibilities in July
2 2003.

3

4 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

5

6 A. My testimony addresses certain aspects of the Application of Palmetto Utility
7 Protection Services, Inc. ("PUPS") for Assignment of the 811 Abbreviated
8 Dialing Code in South Carolina, and it addresses certain aspects of the
9 testimony of James Glyn Smith in support of that Application.

10

11 Q. PLEASE BRIEFLY SUMMARIZE THE EVENTS THAT LED TO THIS
12 PROCEEDING.

13

14 A. On March 14, 2005, the Federal Communications Commission ("FCC")
15 released an Order designating 811 "as the national abbreviated dialing code to
16 be used by state One Call notification systems for providing advanced notice
17 of excavation activities to underground facility operators."¹ The FCC
18 explained that a "One Call notification system is a communication system
19 established by operators of underground facilities and/or state governments in
20 order to provide a means for excavators and the general public to notify facility
21 operators in advance of their intent to engage in excavation activities."² In

¹ See Sixth Report and Order, *In the Matter of The Use of N11 Codes and Other Abbreviated Dialing Arrangements*, CC Docket No. 92-105, FCC 05-59 at ¶1 (March 14, 2005).

² *Id.* at ¶2.

1 summary, the FCC's Order:

2 requires One Call Centers to notify carriers of the toll-free or local
3 number the One Call Center uses in order to ensure that callers do not
4 incur toll charges;

5 allows carriers to use either the Numbering Plan Area (NPA)-NXX or
6 the originating switch to determine the appropriate One Call Center to
7 which a call should be routed;

8 requires the use of 811 as the national abbreviated dialing code for
9 providing advanced notice of excavation activities to underground
10 facility operators within two years after publication of the Order in the
11 Federal Register; and

12 delegates authority to the states, pursuant to section 251(e), to address
13 the technical and operational issues associated with the implementation
14 of the 811 code.³

15 Pursuant to this Order, PUPS has requested that the 811 abbreviated dialing
16 code be implemented in South Carolina.

17

18 Q. DID THE FCC ESTABLISH A DEADLINE FOR IMPLEMENTING THE
19 811 CODE?

20

21 A. Yes. The FCC requires the use of the 811 code within two years after
22 publication of its Order in the Federal Register. BellSouth understands that
23 this deadline is April, 2007.

24

³ *Id.*

1 Q. IS THE 811 CODE IN USE TODAY IN BELLSOUTH'S OPERATING
2 TERRITORY IN SOUTH CAROLINA?
3
4 A. No.
5
6 Q. DOES BELLSOUTH ANTICIPATE ANY PROBLEMS MEETING THE
7 APRIL 2007 IMPLEMENTATION DEADLINE??
8
9 A. No.
10
11 Q. HOW DOES BELLSOUTH ANTICIPATE IMPLEMENTING THE 811
12 CODE IN ITS SERVICE AREA?
13
14 A. BellSouth anticipates implementing a Central Office level service that will
15 translate an 811 call into a single One Call center number. This is similar to
16 the implementation of other N11 services that BellSouth provides in its
17 operating territory in South Carolina.
18
19 Q. HOW DOES BELLSOUTH ANTICIPATE CHARGING PUPS FOR THE
20 SERVICE?
21
22 A. BellSouth anticipates charging PUPS a non-recurring tariffed charge for
23 establishing this service throughout BellSouth's operating territory in South
24 Carolina and a non-recurring activation charge for each central office in which
25 PUPS asks BellSouth to activate the service. Additional tariffed charges

1 would apply if, in the future, PUPS were to change the single One Call center
2 number to which 811 calls are directed.

3

4 Q. IN HIS TESTIMONY, JAMES GLYN SMITH OF PUPS REQUESTS
5 INFORMATION REGARDING THE AMOUNT OF THESE CHARGES BY
6 JUNE 30, 2006. DOES BELLSOUTH ANTICIPATE BEING ABLE TO
7 PROVIDE THIS INFORMATION TO PUPS BY JUNE 30, 2006?

8

9 A. Yes.

10

11 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

12

13 A. Yes.

14

15

16

17

18

19 #629825

STATE OF SOUTH CAROLINA)
)
COUNTY OF RICHLAND) CERTIFICATE OF SERVICE

The undersigned, Nyla M. Laney, hereby certifies that she is employed by the Legal Department for BellSouth Telecommunications, Inc. ("BellSouth") and that she has caused BellSouth Telecommunications, Inc.'s Direct Testimony of Kathy K. Blake in Docket No. 2005-390-C to be served upon the following this April 12, 2006:

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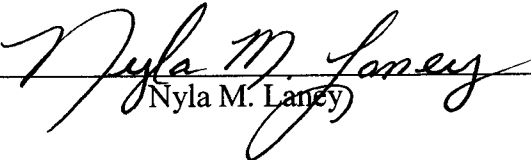
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